

## REMARKS

Claims 1-3 are pending in this application. Claims 1-3 stand rejected.

Applicant wishes to thank the Examiner for conducting a telephone interview with the Applicant's representative.

Independent claim 1 has been amended to clarify the patentable subject matter and advance the prosecution of this case. No new matter is introduced by the requested amendment to Applicant's claim.

Claims 1-3 are provisionally rejected under the judicially created doctrine of double patenting over claims 1-7 of co-pending Application No. 09/814,235. In response, a terminal disclaimer is timely filed herewith in compliance with 37 CFR 1.321(c) to obviate the rejection. It is respectfully submitted that the conflicting application is commonly owned with the instant application.

Claims 1-3 are also rejected under 35 USC 102(b) as being anticipated by U.S. Patent 5,825,772 (hereinafter Dobbins). Applicant respectfully traverses the rejections for the following reasons.

As a general overview, the present invention discloses a network relay apparatus for providing a secure packet communication between domains without complex filters. The relay apparatus comprises a domain definition module for defining a domain configured by one or more networks, and an inter-domain communication definition module for defining connectability between the domains.

The relay apparatus of the present invention provides a secure packet communication between different domains by determining whether the communication is permitted or not between the source domain and the destination domain based on the data (a source/destination

domain identifier, an inter-domain communicability information, and an address translation rule) defined in the inter-domain communication definition module. This is illustrated in Fig. 1 and described in the specification on page 16, line 15 to page 18, line 9; Fig. 7 and the specification on page 21, lines 4 – 12; Fig. 4 and specification on page 27, lines 8 – 20.

Further according to the present invention as recited in claim 1, the routing information storage module stores domain routing information corresponding to each of the domains defined by the domain definition module. The domain routing information includes a destination network address to which a packet is sent, a next-hop gateway address to which the packet is relayed, an output interface identifier for identifying the interface module to which the packet is output, and the domain identifier for identifying the correspondence between the domain routing information and the domains. If the source domain is same as the destination domain, i.e., the packet is transferred within a domain, then the packet is transferred by referring only to domain routing information. Otherwise, i.e., the packet is transferred between different domains, the connectability is judged based on the information defined in the inter-domain communication definition module. In this case, the packet is transferred if the connection is permitted. This is described in Figs. 3, 8-10, 12 and the specification on page 19, line 13 to page 20, line 1, and page 31, lines 5 – 15.

In Fig. 3 of the instant application, in the case when the source domain is same as the destination domain, the routing information for the source domain is designated in RECEIVING INTERFACE DOMAIN ROUTING TABLE 21. The other routing information for domain, which can be a destination for the packets, is designated in DESTINATION DOMAIN ROUTING TABLE 20. Further according to the present invention, the routing information for each domain is shown in Figs. 8-10 and the routing information storage

module including the domain identifier is shown in Fig. 12, even though the domain identifier is omitted because each entry has the same value as the domain identifier.

In contrast, Dobbins shows access switches, where each switch maintains a local

PAGE 11/13 \* RCVD AT 11/9/2005 10:03:53 AM [Eastern Standard Time] \* SVR:USPTO-EFXRF-6/27 \* DNIS:2738300 \* CSID:2129407049 \* DURATION (mm-ss):08-16

between the domains defined by the domain definition module, the connectability based on a combination of the following parameters: a source/destination domain identifier, an inter-domain communicability field, and a translation rule; and a routing information storage module for storing domain routing information corresponding to each of the domains defined by the domain definition module, the domain routing information including a destination network address to which a packet is sent, a next-hop gateway address to which the packet is relayed, an output interface identifier for identifying the interface module to which the packet is output, and the domain identifier defined in said domain definition module for identifying the correspondence between the domain routing information and each of the domains defined by the domain definition module. It is submitted that Dobbins cannot accomplish a secure packet transfer between domains.

According to MPEP section 2131, to anticipate a claim, the reference must teach every element of the claim. Since several elements of the present invention, as discussed above, are clearly missing in the reference, it is respectfully submitted that Dobbins does not anticipate (or render obvious) Applicant's claim 1. Withdrawal of the rejection is, therefore, respectfully requested.

Claims 2 and 3 depend from independent claim 1 and inherit all of its features. Since claim 1 is allowable as discussed above, at least for those reasons claims 2 and 3 are also allowable by virtue of their dependency. Withdrawal of the rejections of claims 2 and 3 is, therefore, earnestly solicited.

An earnest effort has been made to be fully responsive to the Examiner's rejections condition for allowance. Passage of this application to allowance is earnestly solicited. In view of the above amendments and remarks, it is believed that the present application is in

However, if for any reason this application is not considered to be in condition for allowance, the Examiner is invited to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Please charge Deposit Account No. 50-1290 Terminal Disclaimer fees.

We respectfully request that all fees relating to this application be charged to Deposit Acct. No. 50-1290.

Respectfully submitted,

  
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